

Hearing Date/Time: April 24, 2024 at 10:00 a.m. (prevailing Eastern Time)
Objection Deadline: April 17, 2024 at 4:00 p.m. (prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
	:
CELSIUS NETWORK LLC, et al.¹	: Case No. 22-10964 (MG)
	:
	: Jointly Administered
Debtor	:
-----X	

**NOTICE OF MOTION FOR RECONSIDERATION BY THE AD HOC GROUP OF
EARN ACCOUNT HOLDERS PURSUANT TO FED. R. BANKR. PROC. 9023 AND 9024
OF MEMORANDUM OPINION GRANTING IN PART AND DENYING
IN PART ITS INITIAL SUBSTANTIAL CONTRIBUTION APPLICATION**

PLEASE TAKE NOTICE that the Ad Hoc Group of Earn Account Holders (the “**Ad Hoc Earn Group**”) filed its Application of Ad Hoc Group of Earn Account Holders Pursuant to 11 U.S.C. §§ 503(b)(3)(D) and 503(b)(4) for Allowance and Payment of Professional Fees and Expenses Incurred in Making a Substantial Contribution on October 2, 2023 [ECF No. 3654]. On February 29, 2024, the Court issued a Memorandum Opinion Granting in Part and Denying in Part Substantial Contribution Application of Ad Hoc Earn Group [ECF No. 4395]. The Ad Hoc

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC’s principal place of business is 121 River Street, PH05, Hoboken, New Jersey 07030.

Earn Group has now filed its Motion for Reconsideration of Memorandum Opinion Granting in Part and Denying in Part Substantial Contribution Application of Ad Hoc Earn Group Pursuant to Fed. R. Bankr. Proc. 9023 and 9024 (the “**Motion**”) dated March 14, 2024 [ECF No. 4658].

PLEASE TAKE NOTICE that, a hearing on the Motion to Reconsider will be held before the Honorable Martin Glenn, Chief United States Bankruptcy Judge, on April 24, 2024, at 10:00 a.m., prevailing Eastern Time (the “**Hearing**”).

PLEASE TAKE FURTHER NOTICE that the Hearing will take place in a hybrid fashion both in person and via Zoom for Government. Those wishing to participate in the Hearing in person may appear before the Honorable Martin Glenn, Chief United States Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of New York, in Courtroom No. 523, located at One Bowling Green, New York, New York 10004-1408. Those wishing to appear remotely at the Hearing, whether making a “live” or “listen only” appearance before the Court, need to make an electronic appearance (an “eCourtAppearance”) through the Court’s website at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>. When making an eCourtAppearance, parties must specify whether they are making a “live” or “listen only” appearance. **eCourtAppearances need to be made by 4:00 p.m., prevailing Eastern Time, the business day before the hearing (i.e., on April 23, 2024).**

PLEASE TAKE FURTHER NOTICE that due to the large number of expected participants in the Hearing and the Court’s security requirements for participating in a Zoom for Government audio and video hearing, all persons seeking to attend the Hearing at 10:00 a.m., prevailing Eastern Time on April 24, 2024, **must connect to the Hearing beginning at 9:00 a.m., prevailing Eastern Time on April 24, 2024.** When parties sign in to Zoom for Government and add their names, they must type in the first and last name that will be used to

identify them at the Hearing. Parties that type in only their first name, a nickname, or initials will not be admitted into the Hearing. When seeking to connect for either audio or video participation in a Zoom for Government Hearing, you will first enter a “Waiting Room” in the order in which you seek to connect. Court personnel will admit each person to the Hearing from the Waiting Room after confirming the person’s name (and telephone number, if a telephone is used to connect) with their eCourtAppearance. Because of the large number of expected participants, you may experience a delay in the Waiting Room before you are admitted to the Hearing.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the relief requested in the Motion shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) be filed electronically with the Court on the docket of In re Celsius Network LLC, No. 22-10964 (MG) by registered users of the Court’s electronic filing system and in accordance with all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York (which are available on the Court’s website at <http://www.nysb.uscourts.gov>); and (d) be served in accordance with the Second Amended Final Order (I) Establishing Certain Notice, Case Management, and Administrative Procedures and (II) Granting Related Relief [ECF No. 2560] (the “Case Management Order”) **by April 17, 2024, at 4:00 p.m., prevailing Eastern Time**, to (i) the entities on the Master Service List (as defined in the Case Management Order and available on the case website of the Debtors at <https://cases.stretto.com/celsius>) and (ii) any person or entity with a particularized interest in the subject matter of the Motion, including Offit Kurman, P.A., counsel to the Ad Hoc Group of Earn Account Holders at 590 Madison Avenue, 6th Floor, New York, NY 10022, Attn: Jason A.

Nagi, Esq. (jason.nagi@offitkurman.com) and at 1954 Greenspring Drive, Suite 605, Timonium, MD. 21093, Attn: Joyce A. Kuhns, Esq. (jkuhns@offitkurman.com); and the Office of the United States Trustee for the Southern District of New York (Region 2), U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: Shara Cornell, Esq. (shara.cornell@usdoj.gov).

PLEASE TAKE FURTHER NOTICE that only those responses or objections that are timely filed, served, and received will be considered at the Hearing. Failure to file a timely objection may result in entry of a final order granting the Motion.

PLEASE TAKE FURTHER NOTICE that copies of all pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/Celsius>. You may also obtain copies of all pleadings filed in these chapter 11 cases by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: New York, New York
March 14, 2024

Respectfully Submitted,

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